

EXHIBIT G

POST-CLOSURE EMERGENCY RESPONSE PLAN

**POST-CLOSURE EMERGENCY RESPONSE PLAN
SESI PROPERTY
OTAY MESA
SAN DIEGO COUNTY, CALIFORNIA**

PREPARED FOR:

**Coordinating Committee
United States District Court
940 Front Street
San Diego, California 92189**

PREPARED BY:

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Principal**

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1.0 PURPOSE AND SCOPE

This Emergency Response Plan was prepared in accordance with Title 27, California Code of Regulations, Subchapter 5, Article 2, Section 21130, for the Sesi property and shall be included as part of the Sesi Property Post-Closure Maintenance Plan. The Plan identified occurrences that may impact the site and may endanger public health or the environment. The Plan also sets forth actions which will minimize the effects of these catastrophic events. The provisions of this Plan will be carried out immediately whenever an event occurs such as a fire, explosion, flood, earthquake, vandalism, surface drainage problem or release of any waste product which may threaten public health and/or the environment.

2.0 SITE SAFETY

All fire and hazardous materials emergencies on the site are to be handled by the City of San Diego Fire Department. The fire department is capable of responding to fire or hazardous materials emergency situations. Copies of this plan will be provided to the Fire Marshall's office, which has overall responsibility for emergency situations. The Fire Department's business office is located at:

1010 Second Avenue, Suite 300

San Diego, California 92101

(619) 533-4400

The Court Appointed Emergency Response Contractor will oversee the management of all emergency response procedures implemented at the facility. They are required to be thoroughly familiar with all aspects of the plan as well as all post-closure maintenance activities, the location and known characteristics of buried refuse.

The Emergency Response Contractor will also designate a responsible officer in handling emergency situations such as a fire, vandalism or an earthquake and to evaluate the environmental impact of any emergency.

3.0 EMERGENCY RESPONSE NOTIFICATION PROCEDURE

During the post-closure maintenance inspection, when the responsible officer(s) (or any member of their staff) discover or witness an event which may constitute an emergency situation they will immediately report the occurrence to the Fire Department. The responsible officer will assess the nature, source, and location of the emergency situation. If the response officer concludes that an emergency has occurred, he will notify all of the appropriate response agencies to provide assistance to site personnel and proceed to the site to assume command of the situation. If an emergency event occurs when field personnel are not onsite, the general public may use the telephone number posted at the site entrance to notify the Fire Department.

4.0 EMERGENCY RESPONSE PLAN DISTRIBUTION

The emergency response Plan will be distributed to the following agencies:

Mr. and Mrs. Salim D. Sesi

United State Court Coordinating Committee

City of San Diego Fire Department

State of California:

California Regional Water Quality Control Board, San Diego Region

California Integrated Waste Management Board

Local Enforcement Agency

State Department of Health Services

5.0 EMERGENCY RESPONSE PLAN ORIENTATION

Once the Plan has been distributed to the appropriate agencies listed above, and contacts have been made with the appropriate agency representatives, the following information will be conveyed and understandings reached:

1. Familiarize them with the layout of the facility, the properties of the waste materials handled, and the evacuation routes.
2. Establish understandings between the Police and Fire Departments and designate which agency has primary emergency authority during the incident.
3. Establish understandings between Police and Fire Department's emergency response teams, emergency response contractors, and equipment suppliers for smooth coordination of emergency response actions.
4. Make arrangements to familiarize medical staff from the local hospitals with the types of injuries or illness which may occur as a result of an emergency situation.

6.0 EMERGENCY RESPONSE PROCEDURES

The emergency response procedure for fire, explosions, earthquakes, floods, vandalism, and release of waste products to air and soil, and surface drainage problems are described below.

The following general procedures will be followed during any of the above listed emergency situations:

1. Remove all non-essential persons from the vicinity of the incident.
2. Notify and evacuate residents on adjacent housing and work sites if there is an imminent threat to public health and safety.
3. Determine and identify the nearest source of available equipment and supplies for responding to the incident.
4. Remove non-essential equipment, if it can be done safely, from the vicinity of the incident.
5. When practicable, the responsible officer may utilize onsite personnel and equipment to control the incident.
6. The responsible officer will set up a command post near the site, and communicate to the appropriate response agencies.

7. The responsible officer designated by the United States District Court, and all members of his staff, will be supplied with full face respirators when conducting any inspections of the site for possible failure resulting from the catastrophic event.
8. The responsible officer will immediately begin surveillance in those areas of the facility affected by the incident. In addition, monitoring will be conducted to ensure that an incident does not affect other areas of the site or adjacent properties.
9. Shut down any control system, such as the liquid collection system that has been damaged during an incident.
10. The Owner will maintain a stockpile of final cover material for those catastrophic events which may require immediate cover placement to curb waste releases, to repair severe cracks, or to fill in large erosion gullies.

The following procedures will be followed during incidents of fire and/or explosions:

1. Contact the Fire Department even if onsite capabilities are deemed adequate to extinguish fires or control future explosions. Special project crew members will be instructed to follow the Fire Department's directions and give their full cooperation.
2. In the event of an offsite fire near the landfill, such as a brush fire, the Fire Department similarly must be contacted.

The following procedures will be followed during incidents of Flood:

1. A special project crew working for the responsible officer may cut diversion channels or build temporary berms to avoid inundation of the refuse cell.

2. Sand bags may also be used in coordination with diversion channels. A supply of soil will be kept onsite for filling the sand bags.

The following procedures will be followed during an incident of Earthquake:

1. Cracks observed in the final cover after an earthquake will be inspected with a combustible gas analyzer. The inspector will also be equipped with Tyvek suit and air purifying respirator. The location of venting and the gas concentrations will be determined and reported to the responsible officer. Excavation and refill of the smaller surface cracks will be repaired immediately. More extensive corrective actions will be determined by the responsible officer's engineering staff in accordance with the Construction CQA Plan.

7.0 TIMETABLE FOR MITIGATING EMERGENCIES

In the event of an emergency, measures should be taken to mitigate conditions leading to public hazards immediately.

8.0 EQUIPMENT NEEDED IN AN EMERGENCY

The responsible officer acting for the United State District Court through a contractual agreement with an equipment rental organization, must have at its disposal equipment needed for emergency repair of the closure improvements impacted by fire, earthquake, etc. In an emergency this equipment should be dispatched to the site immediately if the situation warrants.

9.0 EVACUATION PROCEDURES

During and/or after an incident the responsible officer in consultation with other emergency personnel, such as the Fire Department and the Police, will assess the potential for injury to the residents located in the area, adjacent to the landfill. If the assessment concludes that an imminent threat to public health and safety is possible, an evacuation of the nearby area will be started. Situations which warrant partial or complete evacuation of site personnel and/or nearby residents are as follows:

1. Explosions resulting in airborne debris including particles and large fragments.
2. Spills or chemical reactions resulting in highly toxic fumes or vapors.
3. Fires that cannot be readily contained or are spreading to other parts of the facility; or when fire could generate high toxic fumes, or create a danger of igniting potentially explosive substances which may be stored onsite.

10.0 MEDICAL CARE PROCEDURE

Should an emergency situation result in personal injury, immediate steps will be taken to determine the cause and extent of the injury and to render first aid. The paramedics will be called when required. If further medical attention is necessary, the injured person will be transported to the designated medical facility. The designated facility for this site is:

Community Hospital of Chula Vista

751 Medical Center Court

Chula Vista, California

Telephone No.: (614) 421-6110

11.0 AMENDMENTS TO THE EMERGENCY RESPONSE PLAN

The Emergency Response Plan will be reviewed and immediately amended, in accordance with the criteria listed in Title 27, CCR, Section 21130(c). The amendment criteria are as follows:

1. A failure or release occurs for which the Plan did not provide an appropriate response.
2. The post-closure use and/or structures on the site change and these changes are not addressed in the existing Plan.
3. The Local Enforcement Agency or the CIWMB notifies the Owner in writing that the current emergency response plan is inadequate under the provisions of this section. The notifying agency will include within the written notice those items that must be considered for the plan to be in compliance with this section. The Owner will submit an amended emergency response plan to both the Local Enforcement Agency and the Board within 30 days of receipt of notification that the plan is inadequate.